

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION**

This document relates to:

*The County of Summit, Ohio, et al. v. Purdue
Pharma L.P., et al.*
Case No. 18-op-45090

and

*The County of Cuyahoga v. Purdue Pharma
L.P., et al.*
Case No. 1:18-op-45004

**MDL No. 2804
Case No. 17-md-2804
Hon. Judge Dan A. Polster**

**CARDINAL HEALTH, INC.'S
FINAL AFFIRMATIVE DEPOSITION TESTIMONY DESIGNATIONS**

Pursuant to the Civil Jury Trial Order, ECF No. 1598, entered in *In re National Prescription Opiate Litigation* (MDL 2804) on May 1, 2019 (as amended in Judge Polster's July 29, 2019 order), Defendant Cardinal Health, Inc. hereby submits its final affirmative deposition testimony designations for Eric Brantley (see Exhibit 1) and Steven Reardon (see Exhibit 2), together with Plaintiffs' objections and counter-designations, and Cardinal Health's responses to Plaintiffs' objections and counter-designations.

Cardinal Health reserves all rights, including all rights to revise or withdraw its final affirmative deposition testimony designations for Mr. Brantley or Mr. Reardon and its responses to Plaintiffs' objections. Cardinal Health also reserves the right to play, in response to deposition testimony played by Plaintiffs, any testimony it designated affirmatively. Cardinal Health also reserves the right to play any testimony Plaintiffs have designated.

By submitting these final affirmative deposition testimony designations, Cardinal Health does not waive any objections to the use of testimony and/or exhibits or their subject matter. Cardinal Health's inclusion of any testimony and/or exhibit within these final affirmative deposition testimony designations should not be construed as an admission that such testimony and/or exhibit is admissible if offered by Plaintiffs or another defendant. Cardinal Health expressly reserves the right to object to Plaintiffs' attempts to introduce any testimony and/or exhibit included in these final affirmative deposition testimony designations.

Consistent with prior representation by Plaintiffs' counsel that "objections and colloquy will not be proffered" by Plaintiffs, Cardinal Health has not objected on a line-by-line basis to all objections and colloquy. Instead, Cardinal Health objects to the designation of all objections and colloquy as a global matter.

Dated: October 10, 2019

Respectfully submitted,

/s/ Enu Mainigi

Enu Mainigi

WILLIAMS & CONNOLLY LLP

725 Twelfth Street, N.W.

Washington, DC 20005

Telephone: (202) 434-5000

Fax: (202) 434-5029

emainigi@wc.com

Counsel for Defendant Cardinal Health, Inc.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served on October 10, 2019 via electronic transfer to all counsel of record, consistent with the Court's order.

/s/ Enu Mainigi

Enu Mainigi